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8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 In Re Bard IVC Filters Products  
Liability Litigation

No. MD-15-02641-PHX-DGC

**JOINT MOTION TO EXTEND  
DEADLINES FOR EXPERT REPORTS  
REGARDING PLAINTIFF TINLIN  
PURSUANT TO CMO 39**

(Assigned to the Honorable David G.  
Campbell)

16 The parties, by and through their respective undersigned counsel, hereby submit  
17 this Joint Motion to Extend Deadlines for Expert Reports regarding Plaintiff Tinlin.

18 The parties stipulate to extend the deadlines set forth in Case Management Order  
19 39 (Doc. 12971) regarding the disclosure of case specific expert reports. Pursuant to this  
20 stipulation, the deadline for Plaintiff's case specific expert report disclosure would be  
21 December 4, 2018. The deadline for Defendant's case specific expert report disclosure  
22 would be January 4, 2019.

23 RESPECTFULLY SUBMITTED this 16<sup>th</sup> day of November 2018.

24 BEUS GILBERT PLLC

25 By: /s/ Ramon Rossi Lopez

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16th day of November 2018, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Marilyn B. Wass